

1 WHEREAS, on January 28, 2025, the Court set a deadline of May 16, 2025, for the
2 defendants to file the dispositive motions contemplated by CMO 17, Paragraph 49, and CMO 19,
3 Paragraph 41, in the eight above-referenced actions; a deadline of June 13, 2025, for the plaintiffs
4 to oppose those dispositive motions; and a deadline of July 11, 2025, for the defendants to file any
5 replies in support of their dispositive motions;

6 WHEREAS, the parties believe additional time would allow the defendants to better
7 coordinate their dispositive motions and streamline their presentation to the Court, thereby serving
8 the interests of efficiency and judicial economy, and potentially reducing the labor to be expended
9 by the plaintiffs in responding to the motions;

10 WHEREAS, the deposition of Plaintiff Ben Shapiro has not yet been completed but is
11 noticed for May 27 and 28, 2025;

12 WHEREAS, remand briefing in *Shapiro v. Juul Labs, Inc.*, Case No. 19-cv-07428, remains
13 open; and

14 WHEREAS, the proposed extensions of time would not otherwise impact this Court's
15 administration of the Multi-District Litigation, including the hearing concerning dispositive
16 motions set for August 15, 2025;

17 NOW THEREFORE, the parties, through their undersigned counsel, hereby jointly
18 stipulate, agree and respectfully request that the Court enter an Order (1) extending the defendants'
19 deadline to file the dispositive motions contemplated by CMO 17, Paragraph 49, and CMO 19,
20 Paragraph 41, by seven days, through and including May 23, 2025; (2) setting a deadline of July
21 11, 2025, for the plaintiffs to oppose any dispositive motions; (3) setting a deadline of August 8,
22 2025, for the defendants to file any replies in support of their dispositive motions; and (4) staying
23 all dispositive motion briefing deadlines in *Shapiro* until the defendants complete the deposition of
24 Ben Shapiro and the Court rules upon the pending remand motion in that action.

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1 RESPECTFULLY SUBMITTED this 16th day of May 2025.

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PROPOSED ORDER AS AMENDED

PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING, IT IS HEREBY

ORDERED:

(1) The defendants' deadline to file the dispositive motions contemplated by CMO 17, Paragraph 49, and CMO 19, Paragraph 41, is extended by seven days, through and including May 23, 2025; (2) the plaintiffs' deadline to oppose any such dispositive motions shall be July 11, 2025; (3) the defendants' deadline to file any replies in support of their dispositive motions shall be August 8, 2025; and (4) notwithstanding the foregoing, all dispositive motion briefing deadlines are stayed as to *Ben Shapiro v. Juul Labs, Inc. et al.*, Case No. 19-cv-07428, until after the defendants complete the deposition of Ben Shapiro and the Court rules upon the pending remand motion in that action, at which time the Court will enter an appropriate scheduling order.

(2) **The August 15, 2025 hearing date for the dispositive motions is vacated and reset to August 22, 2025 at 2:00 pm by videoconference.**

Date: May 21, 2025

W.H.Orrick
HONORABLE WILLIAM H. ORRICK
United States District Judge